

Pre-Rule Making Frequently Asked Questions:

Purpose:

The purpose of this document is to provide stakeholder guidance related to the pre-rule making processes. These processes are a result of the Patient Protection and Affordable Care Act (ACA) of 2010. CMS' goal is to be transparent providing interested audiences and stakeholders with information which enhances CMS' ability to meet its quality and efficiency measurement goals. As a result of the legislation in 2011, CMS published the first Measures under Consideration (MUC) List for the Department of Health and Human Services (DHHS) by December 1st. Each year no later than December 1st, CMS is statutorily required to publish this List.

The National Quality Forum's (NQF), Measures Application Partnership (MAP) DHHS' consensus-based entity convenes each winter to fulfill its statutory requirement of providing input to HHS on measures under consideration for use in CMS' federal programs. These federal programs are named explicitly in the Act. The MAP consists of four workgroups including: Clinicians, PAC/LTC, Hospitals, and the Coordinating Committee. Annually, each December and January, the MAP workgroups and the Coordinating Committee meet to provide program-specific recommendations to DHHS by February 1st with the first report published and submitted to DHHS on February 1, 2012, and then each year thereafter.

CMS considers this document to be a "living" source of pre-rule making information. Since the first MUC/MAP cycle in 2011, CMS has learned through experience the nuances of the pre-rule making, the condensed time-line, overlapping rule-making program calendars, and to overcome the challenges of the federal clearance process to ensure pre-rule making statutory requirements are met. CMS' quality and efficiency measurement goals align with the National Quality Strategy (NQS). Pre-rule making is designed to improve health outcomes and healthcare quality by assisting with the selection of measures that produce publically reported performance results for transparency and healthcare decision-making, aligning payment with value, rewarding providers and professionals for using health information technology (health IT) to improve patient care.

The following are a list of frequently asked questions (FAQs) with regard to pre-rule making and have been broken up into four common themes including CMS' 2015 Pre-Rule Making Milestones, Measures Under Consideration Events, Measures Application Partnership Events, and JIRA CMS' Measures under Consideration Tracking System. The documents intended audience is federal DHHS agencies, organizations contracted with these federal agencies, and the healthcare advocacy groups. For additional information and resources go to the CMS website at the following link:

<http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html>

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CMS' 2015 Pre-Rule Making Milestones:

FAQ Question	CMS Response
<p>Why the following dates are important and who are they important to?</p>	<p>Friday, May 1st</p> <ul style="list-style-type: none"> • JIRA opens for 2015 new measure submissions and comments • Important To: All Federal, non-Federal stakeholders <p>Wednesday, July 1st</p> <ul style="list-style-type: none"> • JIRA new measure submission closes: no new measures accepted past this day • Important To: All Federal, non-Federal stakeholders <p>Wednesday, July 15th</p> <ul style="list-style-type: none"> • 2015 JIRA project closes, no further comments /modifications accepted – All pens-down • Important To: All Federal, non-Federal stakeholders <p>Wednesday, July 22nd</p> <ul style="list-style-type: none"> • Draft for the final Measures under Consideration List due in preparation for the August 5th Federal only Stakeholder meeting • Important To: CMS Measures under Consideration List Coordinator and Federal Stakeholders <p>Monday, August 10th</p> <ul style="list-style-type: none"> • Final Measures under Consideration List enters CMS clearance • Important To: Clearance Documentation Reviewers and Approvers
<p>For 2015, why is the JIRA MUC cycle (i.e., May 1st to July 1st) so condensed? The 2 month window to submit new measures for consideration does not allow for much time to enter measures into JIRA.</p>	<p>Since 2011, CMS has complied with the pre-rule making statute. Through lessons learned CMS has gleaned that the Measures under Consideration clearance process must begin annually in August in order to meet the statutory deadline of publishing the Measures under Consideration List no later than December 1st annually. The clearance process involves collaboration, cooperation and communication across multiple CMS, DHHS and OMB components and agencies, which involves federal staff reviews and approvals at many levels within and across each agency's components. If the clearance process commences any later than August annually, CMS is at risk of missing the statutory mandate.</p>
<p>When does clearance begin?</p>	<p>CMS will begin clearance on for the 2015 Measures under Consideration list on Monday, August 10th</p>

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Measures under Consideration Events:

Annually, CMS hosts a series of meetings to kick off the annual Measures under Consideration cycle and refresh pre-rule making stakeholders regarding the following topics: the statute, CMS' quality strategy, highlights of the prior year's lessons learned, JIRA system enhancements, pre-rule making federal program specific needs and priorities, as well as an introduction of the current cycle's milestone and future meeting dates.

For the April 28th, 30th, May 8th and 12th series of webinars, following the live demonstration of JIRA, audience participants will be invited to submit questions via the LiveMeeting application. Due to time constraints, any questions that are not responded to via the LiveMeeting will be added to this document for a CMS response, which will be revised and posted to CMS' website for training purposes.

FAQ Question	CMS Response
What is the purpose of the April 28 th , 2015 meeting? Meeting Series #1: 2015 Measures Under Consideration Kick Off	April's 28 th meeting will include these topics, excluding the federal program needs and priorities topic (reserved for May 8 th meeting). With regard to the JIRA system enhancements portion of the agenda, a live demonstration of "entering a new measure submission" as well as how to "submit a question" in JIRA will be offered to the audience. The audience for this meeting is mainly JIRA users, but all Federal DHHS agencies, organizations contracted with these Federal agencies, and healthcare advocacy groups are welcome. For training purposes, the meeting is recorded.
What is the purpose of the April 30 th , 2015 meeting? Meeting Series #2: 2015 Measures Under Consideration JIRA Open Forum	April 30 th 's meeting is to introduce new JIRA material including features and functionality, which was not covered during the April 28 th meeting. The goal is not to be repetitive and cover the same material as previously covered during the April 28 th meeting, but to share new JIRA information. The audience for this meeting is mainly JIRA users, but all federal and non-federal stakeholders are welcome. For training purposes, the meeting is recorded. Following the live demonstration of how to submit a "modify candidate measure" and "feedback" issue types in JIRA the meeting format will be open-forum for questions.
What is the purpose of the May 8 th , 2015 meeting? Meeting Series #3: 2015 Measures Under Consideration Kick Off #2	The topic focal point of the May 8 th meeting will be CMS' program specific measure needs and priorities for the 2015 pre-rule making cycle's Measures under Consideration List. The goal is to align these needs and priorities with candidate measure submissions in JIRA. CMS does not intend for the meetings series topics to be repetitive. This meeting is not intended to demonstrate JIRA capabilities. The meeting is mainly for Federal DHHS agencies, organizations contracted with these Federal agencies, and healthcare advocacy groups.

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<p>What is the purpose of the May 12th, 2015 meeting?</p> <p>Meeting Series #4: 2015 Measures Under Consideration JIRA Open Forum</p>	<p>May 12th's meeting is to introduce new not repetitive JIRA material including features and functionality, which was not covered during the April 28th or 30th meetings. The audience for this meeting is mainly JIRA users, but all federal and non-federal stakeholders are welcome. For training purposes, the meeting is recorded. Following the live demonstration in JIRA the meeting format will be open-forum for questions.</p>
<p>What is the purpose of the August 5th, 2015 meeting?</p> <p>Meeting Series #5: Not on Outlook Yet</p>	<p>The August 5th Federal-only stakeholder meeting is to conclude CMS' measures under consideration list proposal process, which kicks-off the Federal DHHS agencies clearance review and approval process for the Measures under Consideration List.</p> <p>During the August Federal-only meeting, agency representatives from across DHHS will be briefed by each CMS program and measure leads regarding the proposed measures under consideration for the 2015 cycle. CMS measure and program leads will convey how the proposed measures meet CMS' program needs and priorities. In preparation for the meeting, proposed candidate measures will be provided to the DHHS Federal agencies. To effectuate a seamless, smooth clearance process CMS requests Federal DHHS agency representatives responsible for clearance review and approval are present and prepared with concurrence or objections for each of the proposed candidate measures. The meeting objective is for CMS staff to address all questions and concerns related to the Measures under Consideration List with the ultimate goal of avoiding any objections and concerns to proposed measures after this August 5th Federal only DHHS agency wide meeting, and to prevent changes to the Measures under Consideration List once in clearance. Clearance is scheduled to begin on Monday, August 10th</p>
<p>What should I do, if I need to be invited to a meeting in the series or know someone that does?</p>	<p>Contact CMS Measures under Consideration Coordinator:</p> <p>Michelle Geppi Michelle.Geppi@cms.hhs.gov 410.786.4844</p>

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Measures Application Partnership (MAP) Events:

When will the MAP workgroup meetings be scheduled?	In general, the Measures under Consideration List is published annually no later than December 1 st , the MAP workgroup meetings occur in December with the Coordinating Committee meeting in January.
Who can attend the MAP workgroup meetings or the Coordinating Committee meetings?	All MAP meetings are open to the public.

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JIRA CMS' Measures under Consideration Tracking System:

CMS' Measures Under Consideration User Guide, Issue Tracking System Guidance may be downloaded from the CMS website at the following link:
<http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html>

FAQ Question	CMS Response
In 2015, why has the number of JIRA fields increased?	<p>JIRA fields have increased in order to create a faster and more seamless review process for new measures.</p> <p>During the first quarter of 2015, CMS convened a workgroup of stakeholders including CMS QMHAG staff and management; the Measures Manager contractor (Battelle), the National Quality Forum, a measure developer (Quality Insights). The group analyzed and reviewed JIRA's data fields to fill important information gaps. The additional fields were determined to be needed by CMS staff to effectively review and approve proposed measures for the annual Measures under Consideration List. The new JIRA data fields are a mix of optional and required fields. If you have questions regarding what optional fields are required by federal program, please check with the respective program/measure lead(s) to find out what optional fields are needed for measure submission. If an optional field is missing data required by the program, the JIRA submission is at risk of not being accepted by the program / measure lead for the Measures under Consideration List.</p>
How do I obtain user credentials for JIRA?	See section 1.1 of the Measures under Consideration User Guide. http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
What if I forgot my username and password?	In order to gain access to JIRA, reactivate an account, or terminate user credentials, stakeholders should email CMS Measures under Consideration Coordinator, Michelle.Geppi@cms.hhs.gov. When requesting access or reactivation, complete the Accessing JIRA form.
If my measure was on the Measures under Consideration list last year, but was not accepted can I resubmit?	<p>Per section 2.7 of the User Guide: Measures that have been submitted, accepted, and published on a previous Measures under Consideration List should not be resubmitted – only submit if you are expanding the measure into other programs that are not currently using the measure.</p> <p>Measures that were submitted, but not accepted, may be resubmitted with narrative on why the measure was not previously accepted.</p> <p>http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html</p>
In JIRA, if I cannot complete all the fields at once, can I	No, once a measure is started, it must be completed and submitted. JIRA does not have the ability to save incomplete measures. It is suggested that submitters complete the Measure under Consideration data

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save and come back at a later time to finish?	template prior to entering data into JIRA. The template can be located at: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/MultiStakeholderGroupInput.html
In JIRA, what should I do if I need to modify or remove a candidate measure specification after the original JIRA submission is made?	Until July 15th, log on to JIRA and submit a modify 2015 candidate measure issue type. Refer to JIRA User Guide located at CMS' website: http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html
Using JIRA, can I submit the same measure for more than one CMS program?	Yes, submitters can select more than one proposed CMS program for the candidate measure. See chapter 2 of the Measures under Consideration Users Guide. http://www.cms.gov/Medicare/Quality-Initiatives-Patient-Assessment-Instruments/QualityMeasures/Pre-Rule-Making.html